

In accordance with Federal Rules of Civil Procedure 6(b)(1), Defendant, by and through undersigned counsel, respectfully requests this Court to extend the time to respond to Plaintiff's Motion for Spoliation Sanctions until Monday, September 8, 2014. The answer is otherwise due on Monday, August 25, 2014. Pursuant to Local Civil Rule 7(m), Plaintiff's counsel has been contacted and does not oppose the filing of this motion on the condition that EPA agrees to a prompt hearing before the Court on the motion. EPA will not oppose Landmark's request for a prompt hearing on the motion.

Defendant is requesting additional time because of defense counsel's litigation schedule as undersigned counsel has been otherwise occupied with the following litigation matters: preparing USMS witnesses for trial in *Valerino v. Holder, et al.*, 08-0035 (HB)(RM)(D. VI); researching retaliation issues in *Valerino* in anticipation of filing motion for reconsideration; multiple meetings to discuss mediation strategy in *Anderson v. Duncan*, Civ. Act. No. 06-1565 (RMC); preparing and filing Opposition in *CREW v. DOJ*, Civ. Act. No. 11-1106 (RJL);

preparing witness and defending deposition in *Connor v. U.S.A.*, Civ. Act. No. 13-1877 (RCL); preparing for the deposition of Plaintiff in *Wise v. U.S.A.*, Civ. Act. No. 12-1636 (RC) scheduled for August 27, 2014; conducting witness interviews in *Geter v. GPO*, Civ. Act. No. 13-0916 (RWR); answering interrogatories and requests for the production of documents in *Bowe-Connor v. Eric Holder*, Civ. Act. No. 13-1993 (KJB); and filing responsive pleading in *Looks v. CIA*, Civ. Act. No. 14-1163 (BAH).

For the foregoing reasons, Defendant respectfully requests an extension of time to file its opposition on Monday, September 8, 2014.

Respectfully submitted,

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/s/

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